

EXHIBIT B

TRUCKER'S NATIONWIDE, INC.

September 11th, 2020

BDS Freight Lines Limited
17 Runnymede Cres
Brampton ON L6R 0L2
Canada

Re: Plaintiff's Original Petition and Discovery Requests to Defendants

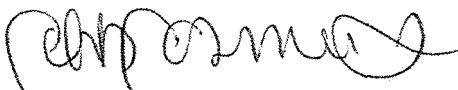
Dear Sirs:

Enclosed is a service of process received by our agent for the State of Texas and accepted on your behalf.

Our company, Trucker's Nationwide, Inc. filed your BOC-3 for you and provides process agents for you in all 50 states, which is a requirement of the FMCSA to maintain your operating authority.

If you have any questions, please call.

Sincerely,



Robb Rasmussen
President

P.P. Box 43
Larchwood, IA 51241

PHONE 800 376-7170
FAX 605 332-5547
EMAIL info@truckersnation.org
WEB SITE www.truckersnation.org

CAUSE NO 20-0726

PSC400
9.2.20

SHARON PERKINS, INDIVIDUALLY
AND AS REPRESENTATIVE OF THE ESTATE OF KELVIN PERKINS

IN THE 71ST JUDICIAL DISTRICT COURT
OF HARRISON COUNTY, TEXAS

VS.

GOPINDER MANGAT; BDS FREIGHT LINES LIMITED

CITATION

TO: THE SHERIFF OR ANY CONSTABLE OF TEXAS
OR ANY OTHER AUTHORIZED PERSON

THE STATE OF TEXAS
COUNTY OF HARRISON

TO: BDS FREIGHT LINES LIMITED, THROUGH RESGISTERED AGENT
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION, TRUCKER NATIONWIDE, INC, REGISTERED AGENT
933 BRAODWAY STREET
LARCHWOOD, IOWA 51241

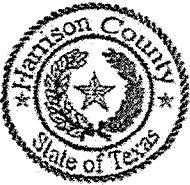
Attached is a copy of **PLAINTIFF'S ORIGINAL PETITION AND DISCOVERY REQUESTS TO DEFENDANTS**. This instrument was filed on the 22nd day of July, 2020, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation is issued 23rd day of July, 2020, under my hand and seal of said Court.

SHERRY GRIFFIS
Harrison County, Texas
Harrison County Courthouse
200 W. Houston St., STE 234
Marshall, TX 75670



Issued at the request of
WITHERITE LAW GROUP, PLLC
ADEWALE ODETUNDE
10440 N. CENTRAL EXPRESSWAY SUITE 400
DALLAS, TEXAS 75231-2228

BY Brandy Rindemann
DEPUTY CLERK

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at ____ o'clock __m., on the ____ day of ____, 20__.
Executed at ____ in ____ County at ____ o'clock __m.
on the ____ day of ____, 20__, by delivering to ____
defendant, in person, a true copy of this citation together with the accompanying copy of the petition
attached thereto and I endorsed on said copy of the citation the date of delivery.
To certify which I affix my hand officially this ____ day of ____, 20__.

Fee \$ ____

____ of ____ County, Texas
by ____ Deputy

Affiant

On this day, ____, known to me to be the person whose signature appears on the foregoing return,
personally appeared. After being duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on
the return.

SWORN TO AND SUBSCRIBED BEFORE ME ON ____, 20__.

Filed 7/22/2020 4:26 PM

Sherry Griffis

District Clerk

Harrison County, Texas

Brandy Lindemann

Deputy

CAUSE NO. 20-0726

SHARON PERKINS, INDIVIDUALLY
AND AS REPRESENTATIVE OF THE
ESTATE OF KELVIN PERKINS;

Plaintiff,

VS.

GOPINDER MANGAT; AND BDS
FREIGHT LINES LIMITED;

Defendants.

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IN THE DISTRICT COURT OF

HARRISON COUNTY, TEXAS

71st

JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION AND DISCOVERY REQUESTS TO
DEFENDANTS**

Plaintiff Sharon Perkins, individually and as representative of the estate of Kelvin Perkins, files Plaintiff's Original Petition complaining of Defendants Gopinder Mangat and BDS Freight Lines Limited.

I. DISCOVERY CONTROL PLAN

Discovery is intended to be conducted under Level 3 pursuant to Rule 190 of the TEXAS RULES OF CIVIL PROCEDURE.

II. RULE 47 PLEADING REQUIREMENTS

As required by Rule 47(b), Texas Rules of Civil Procedure, Plaintiff's counsel states that the damages sought are in an amount within the jurisdictional limits of this Court. As required by Rule 47(c), Texas Rules of Civil Procedure, Plaintiff's counsel states that Plaintiff seeks monetary relief of over \$1,000,000. The amount of monetary relief actually awarded, however, will ultimately be determined by a jury. Plaintiff also seeks pre-judgment and post-judgment interest at the highest legal rate.

III. PARTIES

Plaintiff Sharon Perkins is an individual resident of Marshall, Harrison County, Texas. Her driver's license number is *****621 and her social security number is ***-**-747.

Defendant Gopinder Mangat is an individual resident of Ontario Canada. His address is 39 Switchback Trail, Brampton, Ontario L6R 3H1. Pursuant to the Hague Service Convention, service of process may be obtained on Defendant by serving this pleading and the citation, issued in the name of the Defendant, Gopinder Mangat, through international private process service.

Defendant BDS Freight Lines Limited is a foreign corporation doing business in the state of Texas. Its principal place of business is in Ontario, Canada, located at 17 Runnymede Crescent, Brampton, Ontario L6R 0L2. It may be served with process by serving its registered agent identified through the Federal Motor Carrier Safety Administration, Truckers Nationwide, Inc., at 933 Broadway Street, Larchwood, Iowa 51241.

IV. JURISDICTION AND VENUE

The Court has jurisdiction over the controversy because the damages are within the jurisdictional limits of this Honorable Court.

This Court has venue over the parties to this action since the incident complained of herein occurred in Harrison County, Texas. Venue therefore is proper in Harrison County, Texas pursuant to the TEXAS CIVIL PRACTICE & REMEDIES CODE §15.002.

V. FACTS

This lawsuit arises out of a motor vehicle collision that occurred on or about Tuesday, November 19, 2019 on State Highway 43 within the city limits of Marshall, Harrison County, Texas. Decedent Kelvin Perkins was operating his vehicle southbound on State Highway 43. Defendant Gopinder Mangat was operating his 18-wheeler northbound on State Highway 43 in the left passing lane. Decedent Kelvin Perkins briefly veered over the double yellow dividing lines and into Defendant's lane of traffic. Defendant Gopinder Mangat took improper evasive action and attempted to steer to the left, into the oncoming lanes of traffic, and crashed into Decedent's oncoming vehicle causing Decedent's vehicle to become entangled with Defendant's tractor and pulled backwards. All vehicles traveled across the southbound lanes of traffic and came to a rest on the side of the road where all vehicles burned. Decedent Kelvin Perkins was pronounced dead at the scene of the incident.

VI. CAUSES OF ACTION

A. NEGLIGENCE – DEFENDANT GOPINDER MANGAT

At the time of the motor vehicle collision, Defendant Gopinder Mangat was operating his 18-wheeler negligently. Specifically, Defendant had a duty to exercise ordinary care and operate his 18-wheeler reasonably and prudently.

Defendant breached that duty in one or more of the following respects:

1. Defendant failed to keep such proper lookout and attention to the roadway as a person of ordinary prudence would have kept under the same or similar circumstances;
2. Defendant changed lanes when unsafe to do so;

3. Defendant failed to keep an assured safe distance from Decedent's vehicle;
4. Defendant failed to maintain proper control of his 18-wheeler as a person using ordinary care would have done under the same or similar circumstances;
5. Defendant failed to timely apply the brakes of his 18-wheeler in order to avoid the collision in question;
6. Defendant failed to take proper evasive action;
7. Defendant failed to obtain or have the necessary knowledge, training and experience to safely operate his 18-wheeler;
8. Defendant failed to safely operate his 18-wheeler;
9. Defendant failed to maintain a knowledge and understanding of state and federal motor carrier safety regulations pertaining to procedures for safe vehicle operations in violation of 49 C.F.R. § 383.111; and
10. Defendant failed to have or apply all of his mental faculties because he was distracted by cell phone usage.

B. NEGLIGENT ENTRUSTMENT – DEFENDANT BDS FREIGHT LINES LIMITED

As an additional cause of action, Plaintiff would show that at the time and on the occasion in question, Defendant BDS Freight Lines Limited was the owner of the vehicle driven by Defendant Gopinder Mangat. Defendant BDS Freight Lines Limited entrusted the vehicle to Defendant Gopinder Mangat. Defendant Gopinder Mangat was unlicensed, incompetent, and/or reckless and Defendant BDS Freight Lines Limited knew or should have known that Defendant Gopinder Mangat was unlicensed, incompetent, and/or reckless. Defendant Gopinder Mangat's negligence on the occasion in question proximately caused the collision.

C. RESPONDEAT SUPERIOR – DEFENDANT BDS FREIGHT LINES LIMITED

Additionally, Plaintiff would show that at the time and on the occasion complained of, Defendant Gopinder Mangat was in the course and scope of his employment with Defendant BDS Freight Lines Limited thereby making Defendant BDS Freight Lines Limited liable under the doctrine of *Respondeat Superior*.

D. NEGLIGENCE – DEFENDANT BDS FREIGHT LINES LIMITED

Defendant BDS Freight Lines Limited failed to properly train and/or supervise Defendant Gopinder Mangat in order to prevent such accident.

E. GROSS NEGLIGENCE - DEFENDANT BDS FREIGHT LINES LIMITED

In addition to actual damages, Plaintiffs seek to recover exemplary or punitive damages from Defendant BDS Freight Lines Limited because Defendant's conduct was of such character as to constitute gross negligence. Defendant BDS Freight Lines Limited's actions in connection with the collision involved an extreme degree of risk, considering the probability and magnitude of the potential harm to Decedent and to other users of the public roadways. Defendant BDS Freight Lines Limited had actual, subjective knowledge of the risk involved, but nevertheless acted in conscious indifference to the rights, safety, and welfare of others, including the Decedent, when Defendant BDS Freight Lines Limited chose to allow Defendant Gopinder Mangat to operate a tractor-trailer under Defendant BDS Freight Lines Limited's motor carrier authority on public roadways at the time of the collision.

Each of the above and foregoing acts and omissions, singularly or in combination, constituted the negligence that was the proximate cause of the motor vehicle collision and consequently the injuries and damages of Plaintiff.

VII. WRONGFUL DEATH DAMAGES

Plaintiff sues the Defendants herein to recover damages for the wrongful death of Decedent Kelvin Perkins. Plaintiff has sustained damages, loss of consortium, grief and mental anguish. The death of Decedent Kelvin Perkins and the damages sustained by Plaintiff were proximately caused by the negligence of Defendants. Plaintiff seeks to recover monetary damages for:

- a. Loss of companionship and society in the past and future, that is, the loss of the positive benefits flowing from the love, comfort, companionship, and society that Plaintiff Sharon Perkins would have received from Kelvin Perkins had he lived; and
- b. Mental anguish in the past and future, that is, the emotional pain, torment, and suffering experienced by Plaintiff Sharon Perkins because of the death of Kelvin Perkins.

VIII. SURVIVAL DAMAGES

As a proximate result of Defendants' negligence, Plaintiff Sharon Perkins, as Representative of the Estate of Kelvin Perkins, suffered extensive damages. Plaintiff Sharon Perkins, as Representative of the Estate of Kelvin Perkins, seeks to recover monetary damages for:

- a. The physical pain and emotional pain, torment, and suffering experienced by Kelvin Perkins before his death as a result of the collision in question; and
- b. Funeral and burial expenses for Kelvin Perkins.

IX. EXEMPLARY DAMAGES

Defendants had actual, subjective awareness they were creating a condition where grave injury or death was foreseeable. Nonetheless, they were consciously indifferent to this unreasonable risk and their acts and omissions, therefore, involved an extreme degree of risk when viewed objectively from the Defendants' standpoint. Plaintiff is therefore entitled to exemplary damages.

X. REQUEST FOR DISCLOSURE

Pursuant to Rule 194 of the TEXAS RULES OF CIVIL PROCEDURE Defendants are requested to disclose, within fifty (50) days of service of this request, the information or material described in Rule 194.2 (a)-(l).

XI. DISCOVERY DOCUMENTS

Contemporaneously with this petition, Plaintiff serves to Defendants Plaintiff's First Set of Interrogatories, First Request for Admissions, First Request for Production and Request for Privilege Log to Defendants.

XII. INTENT TO USE DEFENDANTS' DOCUMENTS

Plaintiff hereby gives notice of intent to utilize items produced in discovery against the party producing same. The authenticity of such items is self-proven per TRCP 193.7.

XIII. JURY TRIAL AND OBJECTION TO E-JURY

Plaintiffs demand a trial by jury and include the appropriate jury fees. Plaintiffs object to an electronic jury pool in this case. A jury pool assembled solely based upon electronic responses does not accurately represent the Harrison County community as a whole.

XIV. U.S. LIFE TABLES

Notice is hereby given to the Defendants that Plaintiff intends to use the U.S. Life Tables as prepared by the Department of Health and Human Services.

XV. RELIEF

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Defendants be cited to appear and answer herein, that this cause be set for trial before a jury, and that the Plaintiff recovers judgment of and from the Defendants, for her damages together with the costs of suit, pre-judgment and post-judgment interest.

Respectfully submitted,

WITHERITE LAW GROUP, PLLC

BY: /s/ Adewale Odetunde

ADEWALE ODETUNDE

State Bar No. 24088146

adewale.odetunde@witheritelaw.com

SHELLY GRECO

State Bar No. 24008168

shelly.greco@witheritelaw.com

10440 N. Central Expressway

Suite 400

Dallas, TX 75231-2228

214/378-6665

214/378-6670 (fax)

ATTORNEYS FOR PLAINTIFF

REQUEST
FOR SERVICE ABROAD OF JUDICIAL OR EXTRA JUDICIAL DOCUMENTS

DEMANDE
AUX FINS DE SIGNIFICATION OU DE NOTIFICATION A L'ETRANGER
D'UN ACTE JUDICIAIRE OU EXTRAJUDICIAIRE

Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965

Convention relative à la signification et à la notification à l'étranger des actes judiciaires ou extrajudiciaires en matière civile ou commerciale, signée à La Hage, le 15 Novembre 1965.

Identity and address of the applicant
Identité et adresse du requérant

L. Celeste Ingalls**
Crowe Foreign Services
1020 SW Taylor Street, Suite 240
Portland, Oregon 97205
USA
Email: Lci@foreignservices.com
Fax Number: 1-503-222-3950

Address of receiving authority
Adresse de l'autorité destinataire

Ministry of the Attorney General
Ontario Court of Justice
393 Main Street
Haileybury, ON P0J 1K0
Canada

T (705) 672-3395 ext. 214 F (705) 672-3360

The undersigned applicant has the honour to transmit - in duplicate - the documents listed below and, in conformity with article 5 of the above-mentioned Convention, requests prompt service of one copy thereof on the addressee, i.e.,
(identité et adresse)

Le requérant soussigné a l'honneur de faire parvenir - en double exemplaire - à l'autorité destinataire les documents ci-dessous énumérés en la priant conformément à l'article 5 de la Convention précitée, d'en faire remettre sans retard un exemplaire au destinataire, savior:
(identité et adresse)

Gopinder Mangat
39 Switchback Trail
Brampton, ON L6R 3H1

☒ (a) in accordance with the provisions of sub-paragraph (a) of the first paragraph of article 5 of the Convention.*

a) selon les formes légales (article 5, alinéa premier, lettre a).

☐ ~~(b) in accordance with the following particular method (sub-paragraph (b) of the first paragraph of article 5)*:~~

~~*b) selon la forme particulière suivante (article 5, alinéa premier, lettre b):*~~

☐ ~~(c) by delivery to the addressee, if he accepts it voluntarily (second paragraph of article 5)*.~~

~~*c) le cas échéant, par remise simple (article 5, alinéa 2).*~~

The authority is requested to return or to have returned to the applicant a copy of the documents - and of the annexes* - with a certificate as provided on the reverse side.

Cette autorité est priée de renvoyer ou de faire renvoyer au requérant un exemplaire de l'acte - et de ses annexes - avec l'attestation figurant au verso.

List of documents

Énumération des pièces

Done at Portland, Oregon, USA, the 24 day of Sept, 2020.
Fait à Portland, Oregon, USA, le...

Signature and/or stamp.

Signature et/ou cachet

Hague "Summary" (2 pages)

Citation

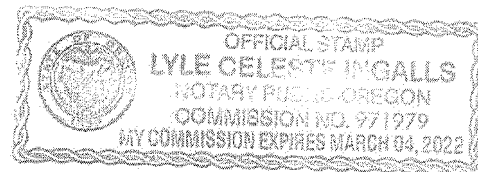
Plaintiff's Original Petition

Plaintiff's First Set of Interrogatories (Gopinder Mangat)

Plaintiff's First Set of Interrogatories (BDS Freight Lines)

Authorization for the Release of Records

Order




L. Celeste Ingalls

* Delete if inappropriate
Rayer les mentions inutiles

** Authorized applicant pursuant to Rule 4(c)(2) of the Federal Rules of Civil Procedure, Public Law 97-462 And Texas District Court Order

CERTIFICATE ATTESTATION

The undersigned authority has the honour to certify, in conformity with Article 6 of the Convention,
L'autorité soussignée a l'honneur d'attester conformément à l'article 6 de ladite Convention,

- ☐ 1. that the document has been served*
que la demande a été exécutée*

- the (date) / le (date):	
- at (place, street, number): à (localité, rue, numéro):	

- in one of the following methods authorised by Article 5: dans une des formes suivantes prévues à l'article 5 :	
<input type="checkbox"/>	a) in accordance with the provisions of sub-paragraph a) of the first paragraph of Article 5 of the Convention* selon les formes légales (article 5, alinéa premier, lettre a)*
<input type="checkbox"/>	b) in accordance with the following particular method*: selon la forme particulière suivante* :
<input checked="" type="checkbox"/>	c) by delivery to the addressee, if he accepts it voluntarily* par remise simple*

The documents referred to in the request have been delivered to:
Les documents mentionnés dans la demande ont été remis à :

Identity and description of person: Identité et qualité de la personne :	
Relationship to the addressee (family, business or other): Liens de parenté, de subordination ou autres, avec le destinataire de l'acte :	

- ☐ 2. that the document has not been served, by reason of the following facts*:
que la demande n'a pas été exécutée, en raison des faits suivants*:

--

- ☐ In conformity with the second paragraph of Article 12 of the Convention, the applicant is requested to pay or reimburse the expenses detailed in the attached statement*.
Conformément à l'article 12, alinéa 2, de ladite Convention, le requérant est prié de payer ou de rembourser les frais dont le détail figure au mémoire ci-joint*.

Annexes / Annexes

Documents returned: Pièces renvoyées :	
In appropriate cases, documents establishing the service: Le cas échéant, les documents justificatifs de l'exécution :	

* if appropriate / s'il y a lieu

Done at / Fait à The / le	Signature and/or stamp Signature et / ou cachet
----------------------------------	--

SUMMARY OF THE DOCUMENT TO BE SERVED

ELEMENTS ESSENTIELS DE L'ACTE

Convention on the service abroad of judicial and extrajudicial documents in civil or commercial matters, signed at The Hague, November 15, 1965

Convention relative à la signification et à la notification à l'étranger des actes judiciaires et extrajudiciaires en matière civile ou commerciale, signée à La Hage, le 15 Novembre 1965.

(article 5, fourth paragraph)
(article 5, alinéa 4)

Name and address of the requesting authority:

Nom et adresse de l'autorité requérante:

**L. Celeste Ingalls
Crowe Foreign Services
1020 SW Taylor Street, Suite 240
Portland, Oregon, USA 97205**

Particulars of the parties*:

Identité des parties:

**Sharon Perkins PLAINTIFFS
Gopinder Mangat, et al. DEFENDANTS**

JUDICIAL DOCUMENT**

ACTE JUDICIAIRE

Nature and purpose of the document:

Nature et objet de l'acte: **To give notice to defendant, Gopinder Mangat, of a claim for civil damages and to summon him to answer the claim.**

Nature and purpose of the proceedings, and, where appropriate, the amount in dispute:

Nature et objet de l'instance, le cas échéant, le montant du litige:

Civil claim for negligence and related actions. Plaintiffs' claims include, but are not limited to, allegations that the accident which occurred on or about November 19, 2019 was the result of the Defendant's negligence in operating the motor vehicle in question, causing the death of Plaintiff, Kelvin Perkins. Plaintiffs seek damages in an amount to be determined, interest, costs of suit, and such other and further relief as the court deems just and proper.

Date and place for entering appearance:**

Date et lieu de la comparution:

N/A

Court which has given judgment:**

Jurisdiction qui a rendu la décision:

N/A

Date of judgment:**

Date de la décision:

N/A

Time limits stated in the document:**

Indication des délais figurant dans l'acte:

Defendant is required to file a WRITTEN ANSWER with the Court by 10:00 AM on the Monday next following the expiration of twenty (20) days after having received the Citation and other documents herein.

EXTRAJUDICIAL DOCUMENT*

ACTE EXTRAJUDICIAIRE

Nature and purpose of the document:

Nature et objet de l'acte:

N/A

Time limits stated in the document:**

Indication des délais figurant dans l'acte:

N/A

*** If appropriate, identity and address of the person interested in the transmission of the document.**

S'il y a lieu, identité et adresse de la personne intéressée à la transmission de l'acte.

**** Delete if inappropriate.**

Rayer les mentions inutiles.

SUMMARY OF THE DOCUMENT TO BE SERVED
PAGE 2 OF 2

*Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters,
signed at The Hague, the 15th of November 1965
(Article 5, fourth paragraph)*

Identite et adresse du destinataire / Identity and address of the addressee / --:

**Gopinder Mangat
39 Switchback Trail
Brampton, ON L6R 3H1**

IMPORTANT

LE DOCUMENT CI-JOINT EST DE NATURE JURIDIQUE ET PEUT AFFECTER VOS DROITS ET OBLIGATIONS. LES «ELEMENTS ESSENTIELS DE L'ACTE» VOUS DONNENT QUELQUES INFORMATIONS SUR SA NATURE ET SON OBJET IL EST TOUTEFOIS INDISPENSABLE DE LIRE ATTENTIVEMENT LE TEXTE MEME DU DOCUMENT IL PEUT ETRE NECESSAIRE DE DEMANDER UN AVIS JURIDIQUE

SI VOS RESSOURCES SONT INSUFFISANTES, RENSEIGNEZ-VOUS SUR LA POSSIBILITE D'OBTENIR L'ASSISTANCE JUDICIAIRE ET LA CONSULTATION JURIDIQUE SOIT DANS VOTRE PAYS SOIT DANS LE PAYS D'ORIGINE DU DOCUMENT

LES DEMANDES DE RENSEIGNEMENTS SUR LES POSSIBILITES D'OBTENIR L'ASSISTANCE JUDICIAIRE OU LA CONSULTATION JURIDIQUE DANS LE PAYS D'ORIGINE PEUVENT ETRE ADRESSEES A:

State Bar of Texas, Lawyer Referral
Texas Law Center
1414 Colorado Street
Austin, Texas 78701
Telephone: 512-427-1463

IMPORTANT

THE ENCLOSED DOCUMENT IS OF A LEGAL NATURE AND MAY AFFECT YOUR RIGHTS AND OBLIGATIONS. THE 'SUMMARY OF THE DOCUMENT TO BE SERVED' WILL GIVE YOU SOME INFORMATION ABOUT ITS NATURE AND PURPOSE YOU SHOULD HOWEVER READ THE DOCUMENT ITSELF CAREFULLY IT MAY BE NECESSARY TO SEEK LEGAL ADVICE

IF YOUR FINANCIAL RESOURCES ARE INSUFFICIENT YOU SHOULD SEEK INFORMATION ON THE POSSIBILITY OF OBTAINING LEGAL AID OR ADVICE EITHER IN THE COUNTRY WHERE YOU LIVE OR IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED.

ENQUIRIES ABOUT THE AVAILABILITY OF LEGAL AID OR ADVICE IN THE COUNTRY WHERE THE DOCUMENT WAS ISSUED MAY BE DIRECTED TO:

State Bar of Texas, Lawyer Referral
Texas Law Center
1414 Colorado Street
Austin, Texas 78701
Telephone: 512-427-1463

CAUSE NO 20-0726

SHARON PERKINS, INDIVIDUALLY

IN THE 71ST JUDICIAL DISTRICT COURT
OF HARRISON COUNTY, TEXAS

AND AS REPRESENTATIVE OF THE ESTATE OF KELVIN PERKINS

VS.

GOPINDER MANGAT; BDS FREIGHT LINES LIMITED

CITATION

TO: THE SHERIFF OR ANY CONSTABLE OF TEXAS
OR ANY OTHER AUTHORIZED PERSONTHE STATE OF TEXAS
COUNTY OF HARRISONTO: GOPINDER MANGAT
39 SWITCHBACK TRAIL
BRAMPTON, ONTARIO L6R 3H1

Attached is a copy of **PLAINTIFF'S ORIGINAL PETITION AND DISCOVERY REQUESTS TO DEFENDANTS**. This instrument was filed on the 23rd day of July, 2020, in the above cited cause number and court. The instrument attached describes the claim against you.

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

TO OFFICER SERVING:

This citation is issued 23rd day of July, 2020, under my hand and seal of said Court.

SHERRY GRIFFIS
Harrison County, Texas
Harrison County Courthouse
200 W. Houston St., STE 234
Marshall, TX 75670



Brandy Kundemann
BY _____
DEPUTY CLERK

Issued at the request of
WITHERITE LAW GROUP, PLLC
ADEWALE ODETUNDE
10440 N. CENTRAL EXPRESSWAY SUITE 400
DALLAS, TEXAS 75231-2228

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at ____ o'clock __m., on the ____ day of ____, 20__.
Executed at ____ in ____ County at ____ o'clock __m.
on the ____ day of ____, 20__, by delivering to ____
defendant, in person, a true copy of this citation together with the accompanying copy of the petition
attached thereto and I endorsed on said copy of the citation the date of delivery.
To certify which I affix my hand officially this ____ day of ____, 20__.

Fee \$ ____

____ of ____ County, Texas
by ____ Deputy

Affiant

On this day, ____, known to me to be the person whose signature appears on the foregoing return,
personally appeared. After being duly sworn, he/she stated that this citation was executed by him/her in the exact manner recited on
the return.

SWORN TO AND SUBSCRIBED BEFORE ME ON ____, 20__.

Notary Public